

Objection Deadline: November 28, 2016, at 4:00 p.m. (Eastern Time)
Hearing Date: December 8, 2016, at 11:00 a.m. (Eastern Time)

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Counsel for Lehman Brothers Holdings Inc.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re	: Chapter 11
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	: Case No.: 08-13555 (SCC)
Debtors.	: (Jointly Administered)
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NOTICE OF MOTION BY LEHMAN BROTHERS HOLDINGS INC.
FOR ENTRY OF AN OMNIBUS ORDER (I) TO ENFORCE AGAINST
NONCOMPLIANT MORTGAGE LOAN SELLERS, AND TO COMPEL
THEM TO COMPLY WITH, THE ALTERNATIVE DISPUTE RESOLUTION
PROCEDURES ORDER FOR INDEMNIFICATION CLAIMS OF THE
DEBTORS AGAINST MORTGAGE LOAN SELLERS, AND (II) FOR CIVIL
CONTEMPT SANCTIONS AGAINST SUCH NONCOMPLIANT MORTGAGE LOAN
SELLERS FOR THEIR VIOLATION OF THE ORDER

PLEASE TAKE NOTICE that on November 16, 2016, Lehman Brothers Holdings Inc. (“LBHI”), as Plan Administrator under the *Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors* for the entities in the above captioned chapter 11 cases (the “Chapter 11 Cases”), filed the motion (the “Motion”) for entry of an omnibus order substantially in the form of the accompanying proposed order (the “Proposed Order”) (i) to enforce against noncompliant mortgage loan sellers identified on the service list annexed hereto (each an “Noncompliant Seller”), and to compel them to comply with, the June 24, 2014 *Alternative Dispute Resolution Procedures Order for Indemnification Claims of the Debtors Against Mortgage Loan Sellers*, entered July 18, 2014 [ECF No. 45277] (the “ADR Order”) in the Chapter 11 Cases, and (ii) for civil contempt sanctions against such Noncompliant Sellers for their violation of the ADR Order, together with the Proposed Order and declaration of Scott Drosdick with all exhibits thereto in support of the Motion, and that a hearing (the “Hearing”) for entry of the Proposed Order will be held before the Honorable Shelley C. Chapman, United States Bankruptcy Judge, in Courtroom 623 of the United States Bankruptcy Court for the Southern District of New York (the “Bankruptcy Court”), One Bowling Green, New York, New York 10004, on **December 8, at 11:00 a.m. (Eastern Time)**, or such other time as the Court may determine.

PLEASE TAKE FURTHER NOTICE that any responses to the Motion shall be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, shall be filed with the Bankruptcy Court (a) electronically in accordance with General Order M-399 (which can be found at www.nysb.uscourts.gov) by registered users of the Bankruptcy Court’s filing system, and (b) by any other parties in interest, on a CD-ROM or 3.5 inch disk, preferably in text-searchable Portable Document Format (PDF) (with a hard copy

delivered directly to Chambers) in accordance with General Order M-182 (which can be found at www.nysb.uscourts.gov) and shall be served in accordance with General Order M-399 and the Order governing case management and administrative procedures entered in the Chapter 11 Cases [ECF No. 9635] upon (i) the chambers of the Honorable Shelley C. Chapman, One Bowling Green, New York, New York 10004, Courtroom 623; (ii) counsel for LBHI, Wollmuth Maher & Deutsch LLP, 500 Fifth Avenue, New York, New York 10110 (Attn: Adam M. Bialek, Esq., and John D. Giampolo, Esq.); (iii) counsel for LBHI, Rollin Braswell Fisher LLC, 8350 East Crescent Pkwy., Suite 100, Greenwood Village, Colorado 80111 (Attn: Michael A. Rollin, Esq. and Maritza D. Braswell, Esq.); and (iv) the Office of the United States Trustee for the Southern District of New York, U.S. Federal Office Building, 201 Varick Street, Suite 1006, New York, New York 10014 (Attn: William K. Harrington, Esq., Susan Golden, Esq., and Andrea B. Schwartz, Esq.), so as to be so filed and received by no later than **November 28, 2016, at 4:00 p.m. (Eastern Time) (the “Objection Deadline”)**.

PLEASE TAKE FURTHER NOTICE that if no responses are timely filed and served with respect to the Motion or any relief requested therein, LBHI may, on or after the Objection Deadline, submit to the Bankruptcy Court an order substantially in the form of the Proposed Order annexed to the Motion, which order may be entered with no further notice or opportunity to be heard offered to any party.

PLEASE TAKE FURTHER NOTICE that objecting parties are required to attend the Hearing, and failure to appear may result in relief being granted or denied upon default.

Dated: New York, New York
November 16, 2016

/s/ James N. Lawlor

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